1 2 3 4 5	WRIGHT, FINLAY & ZAK, LLP Ramir M. Hernandez, Esq. Nevada Bar No. 13146 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 (702) 475-7964; Fax: (702) 946-1345 rhernandez@wrightlegal.net Attorneys for Defendant, 2233 Paradise Road, Lie	LC dba Cash Factory USA
6	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
7		
8	JIMMY EASON JR.,	Case No.: 2:22-CV-01387-JCM-NJK
9	Plaintiff,	JOINT MOTION TO EXTEND
10	VG.	DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT (SECOND
11	VS.	REQUEST)
12	CLARITY SERVICES, INC., 2233 PARADISE ROAD, LLC dba CASH FACTORY USA,	
13	LAC DU FLAMBEAU BAND OF LAKE	
14	SUPERIOR CHIPPEWA INDIANS dba NIGODWAASWI, LLC dba SKY TRAIL	
15	CASH, LAC VIEUX DESERT BANK OF	
16	LAKE SUPERIOR CHIPPEWA INDIANS dba BIG PICTURE LOANS, LLC and NORTH	
17	STAR FINANCE, LLC,	
18	Defendants.	
19		
20	Plaintiff, Jimmy Eason Jr. ("Plaintiff"), and Defendant, 2233 Paradise Road, LLC dba Cas	
21		
22	record, hereby move as follows:	
23	On August 25, 2022, Plaintiff filed his Complaint [ECF No. 1]. Cash Factory USA wa	
24	served with Plaintiff's Complaint on August 26, 2022. The original deadline for Cash Factor	
25	USA to respond to Plaintiff's Complaint was September 16, 2022. On September 19, 2022, th	
26	Court granted Cash Factory USA's Joint Stipulation for Extension of Time for Defendant to fil	
27	Answer, which set October 14, 2022, as the new deadline [ECF No. 7]. The Parties have discusse	
28	extending the deadline for Cash Factory USA to respond to Plaintiff's Complaint to allow for	
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1 better investigation of the allegations and discuss possible resolution of the matter. 2 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Cash Factory 3 USA to file their responsive pleading to Plaintiff's Complaint to November 14, 2022. 4 This is the second motion for an extension of time for Cash Factory USA to file their 5 responsive pleading. Cash Factory USA has just acquired new counsel that needs the additional time to review the facts and allegation in this case. Moreover, the parties are actively discussing 6 7 settlement. In the event the parties cannot resolve the case, it is anticipated that they will stipulate 8 to remove the case to arbitration. The extension is requested in good faith and is not for purposes 9 of delay or prejudice to any other party. 10 As part of this motion, Cash Factory USA agrees to participate in any Rule 26(f) conference that occurs during the pendency of this extension. 11 12 DATED this 14th day of October, 2022. 13 WRIGHT, FINLAY & ZAK, LLP FREEDOM LAW FIRM 14 /s/ Ramir M. Hernandez /s/ Gerardo Avalos 15 Ramir M. Hernandez, Esq. Gerardo Avalos, Esq. 16 Nevada Bar No. 13146 Nevada Bar No. 15171 7785 W. Sahara Ave., Suite 200 8985 S. Eastern Ave., Suite 350 17 Las Vegas, NV 89117 Las Vegas, NV 89123 Attorneys for Defendant, 2233 Paradise Attorneys for Plaintiff, Jimmy Eason Jr. 18 Road, LLC dba Cash Factory USA 19 20 21 22 IT IS SO ORDERED: 23 24 25 UNITED STATES MAGISTRATE JUDGE 26 DATED: October 17, 2022 27 28